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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GWENDOLYN J. ABBOTT,

Plaintiff,

v.

ANDREW SAUL,
Commissioner of Social Security,

Defendant.

Case No.: 2:20-cv-00064-EJY

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Andrew Saul, Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and Remand (Dkt. No. 11, filed on April 21, 2020), currently due on May 21, 2020, by 21 days, through and including June 11, 2020. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order (Dkt. No. 9) be extended accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension due to Defendant's counsel's workload as described below. Since Plaintiff's motion was filed on April 21, 2020, Defendant's counsel has worked on approximately 13 district court cases. Counsel is also responsible for other substantive non-litigation matters in the Office of General Counsel. Among

1 other things, this has included spending significant time helping the Office of General Counsel switch
2 to new processes that are necessary due to the Covid-19 pandemic and related stay-at-home orders.
3 The Office of General Counsel also currently has a number of attorneys out on leave of absence, in
4 addition to staff attrition, which has increased the undersigned's workload at a time when the office is
5 under a hiring freeze.

6 Additional time is required to review the record, to evaluate the numerous issues raised in
7 Plaintiff's motion, to determine whether options exist for settlement, and if not, to prepare Defendant's
8 response to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as
9 possible. This request is made in good faith and with no intention to unduly delay the proceedings,
10 and counsel apologizes for any inconvenience.

11 On May 13, 2020, counsel for Defendant conferred with Plaintiff's counsel, who has no
12 opposition to this motion.

13 It is therefore respectfully requested that Defendant be granted an extension of time to respond
14 to Plaintiff's Motion for Reversal and Remand, through and including June 11, 2020.

15
16 Dated: May 13, 2020

Respectfully submitted,

17 NICHOLAS A. TRUTANICH
18 United States Attorney

19 /s/ Allison J. Cheung
20 ALLISON J. CHEUNG
Special Assistant United States Attorney

21 **IT IS SO ORDERED; however, no further**
22 **extensions will be approved by the Court.**

23 
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: May 14, 2020